

As a Wireless Internet service provider in a rural area, operating on part 15b bands 915mhz, 2.4ghz ISM, 5.2ghz, and 5.8ghz with pre-certified equipment, and serving Rural and Simi-rural areas, we have significant interest in the following dockets:

On Docket # 02-381

On the question of an un-licensed model and lower state of regulation for rural areas, we believe that a un-licensed model using Frequency Hopping Spread Spectrum technology with Carrier Sense (senses if a user is on the band before transmitting) could provide a level of service required by consumers in the areas in question while protecting incumbent users from interference. A FHSS/CS system would only use spectrum defined by its software, and would not transmit on a band in current use. Registering FHSS/CS users would only provide a bureaucratic hurdle to prevent entry to market.

On Docket # 02-380

In our area as well as many other areas there is significant amounts of spectrum not being used because they are locked up in 'TV' spectrum. The above mentioned FHSS/CS system with market codes (codes based on license markets would prevent FHSS/CS from interfering with a existing transmitter) would be effective in managing this system, and allow the lowest amount of regulation required. Further, it would be advantageous to not have a specified standard of what service should be delivered on the band, this would allow multiple services to be ran on the band. FHSS/CS would also maximize the spectrum, as has been shown with current ISM operation.

I would recommend a 'registered' status for the 3.6-3.7 ghz band. A no prior license required but registration within 30 days should allow for efficient use of the band for point-point data connections without the tight requirements of licensed point to point. Due to its high frequency, 3.6ghz would be best suited for point-to-point transmitter usage. There is no current 'ISM' type band specifically for point-to-point digital connections, for infrastructure use one should be created. This would allow now-noise point-to-point links to be made with low rate of interference. To allow for proper engineering, registration of the transmitter would help keep such a system in check, and allow for early detection of a need to expand unlicensed point-to-point spectrum.